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5 *Attorneys for Plaintiffs,*
6 D.M., L.O., AND G.V.

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 D.M., L.O., AND G.V., individually
12 and on behalf of all others similarly
situated,

13 Plaintiff,

14 v.

15 VERGIL SERVICES, INC. D/B/A
16 REDGIFS;

17 Defendant.
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Case No. 2:25-cv-05102-PD

**JOINT MOTION AND
STIPULATION TO SET BRIEFING
SCHEDULE FOR PLAINTIFFS'
FIRST AMENDED COMPLAINT
AND DEFENDANT'S MOTION TO
COMPEL ARBITRATION OR TO
DISMISS FIRST AMENDED
COMPLAINT**

***[Filed Concurrently with [Proposed]
Order]***

Complaint Served: Aug. 13, 2025

New Date to File FAC: Dec. 19, 2025

New Date to File Motion to Dismiss
FAC: Jan. 16, 2026

New Date to File Response to Motion to
Dismiss FAC: Feb. 23, 2026

New Date to File Reply I/S/O Motion to
Dismiss FAC: March 6, 2026

1 Plaintiffs D.M., L.O., and G.V. (“Plaintiffs”) and Defendant VERGIL
2 SERVICES, INC. D/B/A REDGIFS (“Defendant,” and together with Plaintiffs, the
3 “Parties”), by and through their respective counsel of record, stipulate and agree to
4 the following schedule for Plaintiffs’ forthcoming First Amended Complaint and
5 Defendant’s anticipated Motion to Compel Arbitration or to Dismiss the First
6 Amended Complaint (the “Motion”) the same:

7 1. On September 24, 2025, counsel for Plaintiffs and Defendant met and
8 conferred pursuant to L.R. 7-3 regarding Defendant’s anticipated Motion to Compel
9 Arbitration, and the underlying facts relevant to the foregoing.

10 2. Counsel for the Parties agreed to exchange information, and Defendant
11 provided such information as it was able to locate concerning the Plaintiffs on
12 October 12, 2025 and thereafter.

13 3. Counsel for the Parties then conferred by e-mail and by teleconference,
14 including on November 25, 2025, with regards to the information exchanged by the
15 Parties. Through these communications, the Parties determined that, to streamline the
16 disputes requiring resolution through future briefing, Plaintiffs should be permitted
17 to amend their Complaint. Accordingly, the Parties agreed that Plaintiffs may file a
18 First Amended Complaint by December 19, 2025.

19 4. Further, in light of the anticipated complexity of Defendant’s
20 forthcoming Motion to Dismiss the First Amended Complaint, as well as pre-planned
21 travel by counsel for both Parties during the upcoming holiday season, the Parties
22 additionally stipulated and agreed to the following deadlines with regards to
23 Defendant’s anticipated Motion:

- 24 a. Defendant’s Motion: January 16, 2026;
- 25 b. Plaintiffs’ Response to Defendant’s Motion: February 23, 2026;
- 26 c. Defendant’s Reply in Support of its MTD: March 6, 2026.

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1 5. Neither party will suffer prejudice from the extension of the respective
2 deadlines outlined above.

3 THEREFORE, IT IS SO STIPULATED between the Parties, subject to the
4 Court's agreement, that the deadline for Plaintiffs to file their First Amended
5 Complaint shall be December 19, 2025; that Defendant's deadline to file its Motion
6 shall be January 16, 2026; that Plaintiffs' deadline to file a responsive brief in
7 opposition to Defendant's Motion shall be February 23, 2026; and that Defendant's
8 deadline to file a reply brief in support of its Motion shall be March 6, 2026.

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11 Dated: November 26, 2025

Respectfully submitted,

ARENTFOX SCHIFF LLP

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13 By: /s/ Susanne Boniadi
Susanne Boniadi

14 *Attorney for Defendant,*
15 VERGIL SERVICES, INC
D/B/A REDGIFS

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17 Dated: November 26, 2025

SIRI & GLIMSTAD LLP

18 By: /s/ Sonjay C. Singh
Sonjay C. Singh (*pro hac vice*)

19 *Attorney for Plaintiffs,*
20 D.M., L.O., AND G.V.

CERTIFICATE OF CONCURRENCE

I hereby certify and attest that counsel for the Parties have concurred in the filing of the foregoing instrument in accordance with LR 5-4.3.4(a)(2)(i).

/s/ Sonjay C. Singh
Sonjay C. Singh